

MA Department of Housing & Community Development (DHCD)

HOME and Bond Funds
including; HSF, CIPF, HIF, CBH, AHTF
and CATNHP/TOD

RENTAL OCCUPANCY COMPLIANCE
TRAINING AND WORKSHOP

December, 2015



Programs Covered

- HOME
- Housing Stabilization Fund (HSF)
- Capital Improvement and Preservation Fund (CIPF)
- Housing Innovation Fund (HIF)
- Community Based Housing (CBH)
- Affordable Housing Trust Fund (AHTF)
- Commercial Area Transit Node Housing Program (CATNHP)/Transit Oriented Development (TOD)

Workshop Objective

Partnership

- DHCD
- Other funders (e.g., CEDAC, Mass Housing, PHA's, Cities/Towns, Banks, TC Investors)
- FinePoint Associates, LLC
- Property Developers
- Property Owners
- Property Managers
- Tenants



Workshop Objective (cont.)

- Clarify Regulations
- Highlight requirements that:
 - Enhance accountability and performance
 - Improve monitoring and oversight
- Share stories (amnesty)

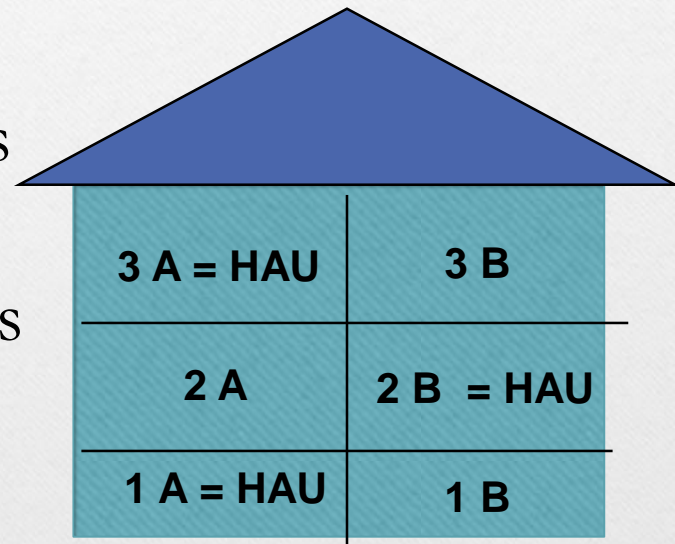
How to Determine “Assisted” Units

Determining HOME-Assisted Units

- Only units receiving DHCD \$ are subject to *household* restrictive requirements; however, the entire property is subject to the Property Standards, Fair Housing, Accessibility, LBP, etc.
- Number of assisted units are specified at project commitment (i.e.: loan closing)
 - For properties with HOME and non-HOME units, units will be “fixed” or “floating” HOME units and will be designated as such in your loan documents.
 - Distribution of assisted units by bedroom size is in the loan documents

HOME Fixed & Floating Units

- **Only HOME** has “fixed” and “floating” designations
- All units in this building are 2 bedroom units. Loan docs indicate 3 are HAUs
- If “Fixed”: 1A, 2B, 3A always HAUs
- If “Floating”: unit numbers change but always have 3 HAUs



Determining Bond Fund Assisted Units

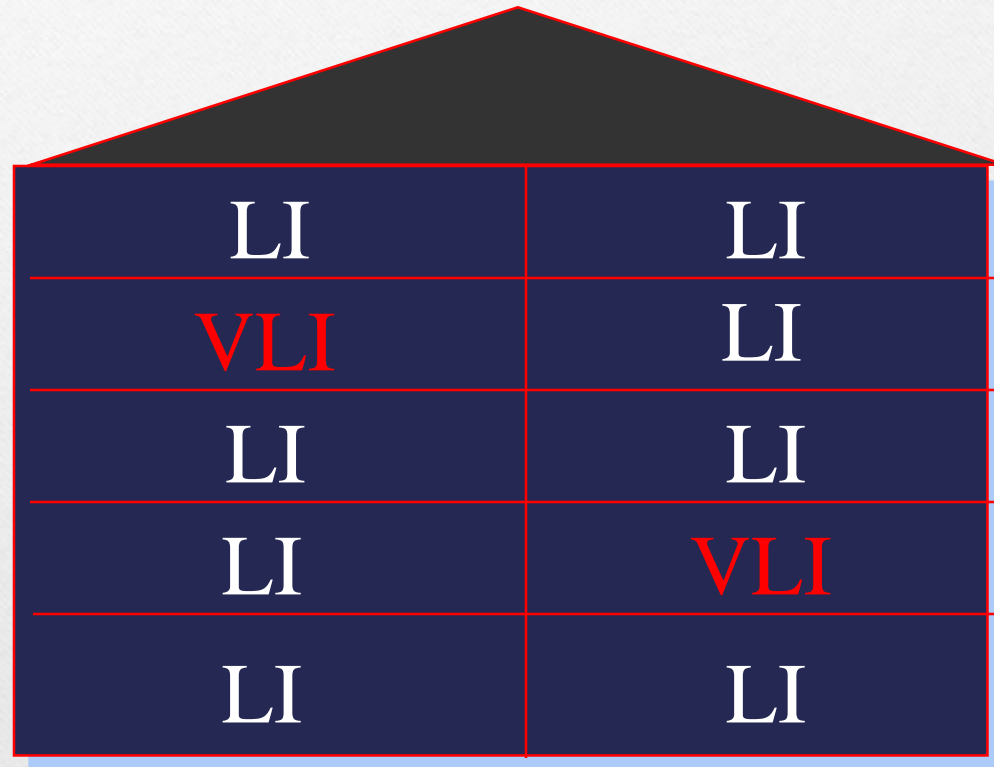
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- Number of Assisted units are specified at project commitment (i.e.: loan closing)
 - Distribution of assisted units by bedroom size is in the loan documents

Income Targeting

HOME Income Targeting

- Always refer to the project's AHR
- BY FUNDING TYPE:
 - HOME-Assisted Units (HAUs):
 - All assisted units reserved for households @or< 60% AMI at move-in and @or< 80% AMI thereafter (LI), and;
 - If 5 or more assisted units: at least 20% of the HOME households must be @or< 50% AMI (VLI).

A HOME Rental Project...



LI	LI
VLI	LI
LI	LI
LI	VLI
LI	LI

HSF, CIPF, AHTF, CATNHP/TOD Income Targeting

- Always refer to the project's AHR
- BY FUNDING TYPE:
 - HSF Units:
 - Reserved for households @or< 80% AMI;
 - HSF has program wide ELI (@or <30% of AMI)
requirement-check you project's AHR!.

HSF, CIPF, AHTF, CATNHP/TOD Income Targeting (cont.)

- CIPF Units:
 - At least 50% of the total units reserved for HH @or< 80% of AMI;
 - A minimum of 5% of the total units reserved for HH @or< 50% AMI
- CATNHP/TOD Units:
 - Not less than 50% of the total units reserved for HH @or< 80%AMI
- AHTF Units:
 - Reserved for households @or< 60 % AMI. (in some cases up to 110% is allowed)

HIF Income Targeting

- HIF Units:
 - At least 50% of the total units reserved of HH @or<80% AMI
 - Of such units, 50% reserved for HH @or< 30% of AMI

CBH Income Targeting

- All units reserved for HH @ or < 80% of AMI
- A majority of CBH tenants will have annual income based solely on SSI and will be below 15% of AMI)
- Persons with physical or mental disabilities that limit one or more major life activity
- Persons institutionalized or is at risk of institutionalization
- 18 years of age or older or a household with a minor child who can qualify under criteria above
- Must be determined to be a Person Certified as Eligible (PCE) by the Mass Rehabilitation Commission (MRC) on Behalf of EOHHS. PCE's must have a certificate of eligibility in file.
- When a CBH unit becomes available Maggie Dionne at the MRC should be contacted as early as possible.

Determining Rents

Rent Limits

- Look at the property's Affordable Housing Restriction (AHR) to see what parameters were defined at the time of the closing
- Property Managers- ask the owner for a copy of the AHR- you really need a copy on site!

HOME Rent Limits

- HOME Rent limits
 - At least 20 % of the HOME units must be designated as VLI units: “Low HOME Rents” - rent is less of “30% of income for HH at 50% AMI or FMR, whichever is lower”
 - Project-based rental assistance exception
 - The remaining HOME units are designated as LI units: “High HOME Rents - rent is “30% of income for HH at 65% AMI or FMR, whichever is lower”
- HUD publishes maximum HOME rents annually. Link on the
 - HUD HOME program homepage for HOME rents
 - DHCD ListServe: To subscribe send a blank email to:
 - join-dhcd-housingdevelopment@listserv.state.ma.us

HOME Rent Adjustments

- All rents adjusted for tenant-paid utilities. Until further guidance:
 - Use current local PHA utility allowance schedule for non- PBV units
 - Use the current approved PBV Administrator's schedule for their PBV units
- Updated HOME Rule requires PJ (DHCD) to determine individual utility allowance for each rental project.
 - NOTE: Implementation of this portion of the rule change was delayed until January 2015 and we are awaiting further guidance from HUD

HOME Program Rent Exception: “VLI” Units and Project Based Rental Subsidies (cont.)

- Only for project-based subsidies AND if both of the following conditions are true:
 - The household pays no more than 30% of adjusted income toward rent, and;
 - The unit is a VLI unit with the occupying HH at/below 50% of AMI
- Then the allowable gross rent is the full contract rent for the project-based subsidy program (can exceed High HOME)
- These units must be designated as “Low HOME units”

HOME Program Rent Exception: “VLI” Units and Project Based Rental Subsidies

- If the household's income exceeds 50% AMI at recertification:
 - The unit is no longer an eligible “VLI” unit, and therefore;
 - The collected rent (gross rent) cannot exceed the HOME rent limit.
 - The subsidy portion may need to be reduced.
 - If allowed per AHR, the unit designation could be swapped.

HOME “VLI” Units and Tenant Based Rental Subsidies

- Tenant-based rental subsidies:
- The maximum gross rent (total collected on unit) is no more than the allowable “HOME rent”
 - If the unit is designated as a Low HOME unit then the rent cannot exceed the LOW HOME rent limit.
 - If the unit is designated as a High HOME unit, the property can collect up to the High HOME rent limit.

HOME Floor Rents

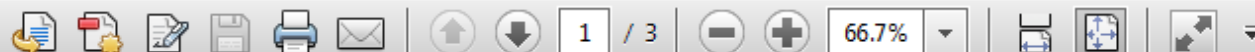
- Rents for HOME Assisted Units do not ever have to be lowered below the HOME rents established at the time of project commitment. (date of the AHR)

HOME Annual Rent Approvals

- Per the updated HOME Rule from 2013, the rent schedule for all HOME-assisted units must be reviewed and approved annually.
- DHCD HOME rent approval form and instructions can be found at
 - www.finepointassociates.com/page5/page5.html

HOME Rent Approval Procedure

- Submission to FinePoint
 - How to handle:
 - Project Based Rental Subsidies
 - Tenant Based Rental Subsidies
 - Rent Ceiling right up to Rent Limits?



Tools

Sign

Comment

DHCD HOME PROGRAM Rent Approval Request

1. Project Name: _____ 2. Request Date: _____

3. Property Address(es): _____
City: _____

4. Utility Allowance Information, if applicable (Identify in Table 9**)

Source of Utility Allowance Schedule(s): A. _____ B. _____ C. _____

Effective Date of Current Schedule: _____

I certify the following information provided on this form to be complete and accurate to the best of my knowledge. 6. Telephone: _____

5. Person completing form: _____ 7. Email: _____

8. Maximum Rents:

Identify the HOME maximum gross rents by bedroom size. These will be known as the Ceiling Rents for non-project-based assisted units.

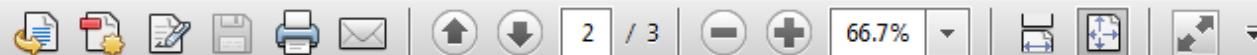
	A. # of HOME Units/Size	B. CURRENT HOME Rent Ceiling			C. PROPOSED HOME Rent Ceiling			D. Current HOME Rent Limit	Gross Rent % Increase	DHCD Approval Date
		Contract Rent	Utility Allowance	Gross Rent	Contract Rent	Utility Allowance	Gross Rent			
Studio	Low/VLI			\$ -			\$ -		#DIV/0!	
	High/LI			\$ -			\$ -		#DIV/0!	
1 bedroom	Low/VLI			\$ -			\$ -		#DIV/0!	
	High/LI			\$ -			\$ -		#DIV/0!	
2 bedroom	Low/VLI			\$ -			\$ -		#DIV/0!	
	High/LI			\$ -			\$ -		#DIV/0!	
3 bedroom	Low/VLI			\$ -			\$ -		#DIV/0!	
	High/LI			\$ -			\$ -		#DIV/0!	
4 bedroom	Low/VLI			\$ -			\$ -		#DIV/0!	
	High/LI			\$ -			\$ -		#DIV/0!	
Other:	Low/VLI			\$ -			\$ -		#DIV/0!	
	High/LI			\$ -			\$ -		#DIV/0!	
TOTAL		0								

FOR PROJECT-BASED UNITS ONLY

In order to exceed the HOME rent limits, the following conditions must apply:

- Household is Very Low-Income (at or below 50% AMI)
- Household pays no more than 30% of their adjusted income towards rent

☐ Verified



Tools

Sign

Comment

DHCD HOME PROGRAM Rent Approval Request

9. Complete for all DHCD HOME-assisted units with current information:

Unit #	Bldg Size	Tenant Rent	* Subsidy Amount	Utility Allowance (UA)	UA Source **	Total Gross Rent	HOME Program Rent Limit	Identify: LOW or HIGH HOME as per AHR	Move-In Date	Rent Effective Date	New Gross Rent Proposed (Inc. UA)	Proposed Rent % Increase	*Is rental subsidy Project-Based? (Y or N)	Other Funding Sources: (i.e. LIHTC, HSF, CIPF, HIF, AHFF)
1						\$ -						#DIV/0!		
2						\$ -						#DIV/0!		
3						\$ -						#DIV/0!		
4						\$ -						#DIV/0!		
5						\$ -						#DIV/0!		
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37						\$ -						#DIV/0!		
38						\$ -						#DIV/0!		
39						\$ -						#DIV/0!		

Rent Approval Procedure (cont.)

Approval from DHCD required if requested increase exceeds 3%.

DHCD may request the following additional documentation as part of their review:

- Current income and expense reports
- Details regarding capital needs
- Additional project information

HSF, CIPF, AHTF, CATNHP/TOD, Max Rent Limits

- Units assisted with DHCD bond funds (but **NOT** HOME) may charge the LIHTC program rents* for the applicable income bands defined in the project's AHR at initial rent up and turnover.

*See the Novogradac website:

www.novoco.com/products/rentincome.php

HIF and CBH Max Rent Limits

- HIF IV, V and VI
 - Follow the same rent restrictions as other DHCD bond funded programs
 - LIHTC rent limits for applicable income bands defined in the project's AHR
- Exceptions
 - HIF I, II, III and CBH
 - Rent cannot exceed 35% of tenant's actual income

DHCD Bond Fund Programs

Max Rent Limits (cont.)

- All rents must be adjusted for tenant paid utility allowances
 - Utility allowances must be updated annually
 - Use current local PHA utility allowance schedule for non- PBV units
 - Use the approved PBV Administrator's schedule for their PBV units
 - May create site specific utility allowance using tenant's actually utility data gathered by survey
- All of these programs permit owners/mangers to collect the full rent under the applicable payment standard for tenant-based vouchers as well as project-based vouchers (unlike HOME)

Rent and Occupancy Requirements

- Must be enforced for the term of the affordability period through:
 - Affordable Housing Restriction (AHR)
 - Deed Restriction
- Restrictions may only be terminated upon foreclosure. (NOT a preferred option!) With resale to an eligible purchaser, the new buyer will assume a deed rider and its restrictions.

Rent and Occupancy Requirements (cont.)

- Any resale or refi of the property must have prior consent from DHCD (or risk a slow down of the process.)
 - Contact DHCD as early in the sale/refi process as possible

Income Eligibility

How to determine who is eligible to live in the units

CFR Part 5 (Section 8)

- Technical Guide for Determining Income and Allowances for the HOME Program (“The Purple Book”):
<http://www.hud.gov/offices/cpd/affordablehousing/library/modelguides/2005/1780.pdf>
- The HUD Handbook 4350.3 is updated more regularly than the Technical Guide, and may be used as supplementary guidance and “safe harbor”
- However- if 4350.3 contradicts anything stated in the HOME Rule, or Tech Guide, then 4350.3 should never be perceived to overrule or negate the HOME Rule or Guidance.

Annual Income Documentation

All of these elements will be discussed

- *Whose* income is counted?
- *What* income is included?
- What counts as an *asset*?
- How is *income from assets determined*?
- Annual income *recertifications* – how to prepare?

Annual Income Documentation

- For an initial certification (move-in), a determination of income verification must be no more than 6 months old to be valid.

Key Requirements

A. Annual income is the amount of income that is used to determine a family's eligibility for assistance. Annual income is defined as follows:

1. All amounts, monetary or not, that go to or are received on behalf of the family head, spouse or co-head (even if the family member is temporarily absent), or any other family member; or
2. All amounts anticipated to be received from a source outside the family during the 12-month period following move-in or annual recertification effective date.

Key Requirements (cont.)

B. Annual income includes all amounts that are not specifically excluded by regulation.

C. Annual income includes amounts derived from assets (during the 12-month period) to which any member of the family has access.

Determining Household Size (to help determine “who”)

Household size for Income Limits

(this “limits” is not the same as for occupancy standards)

Includes: All persons living in the unit 50% or more of the time (including foster children and adults) plus:

- a. Children temporarily absent (in foster home)
- b. Children in joint-custody (present 50% or more)
- c. Children away at school (return during recesses)
- d. Unborn children of pregnant women
- e. Children in process of being adopted
- f. Temporarily absent family members who are still considered family members*
- g. Family members in hospital or rehab for limited or fixed periods
- h. Persons permanently confined to hospital or nursing home*

(*family chooses, but has to include income if they count the person in household)

Excludes:

- a. A Live-in aides
- b. Guests

Of these household member's
whose income is counted?

Members	Employment income	Other Income (including income from assets)
Head	Yes	Yes
Spouse	Yes	Yes
Co-head	Yes	Yes
Other Adult (including foster adult)	Yes	Yes
<i>Dependents:</i>		
- Children under 18	No	Yes
- Full-time student 18 or older	The earned income of a full-time student 18 years or older who is a dependent is capped at \$480.	Yes
- Foster child under 18	No	Yes
Nonmembers		
- Live-in aide	No	No
- Guest	No	No

Determining Annual Income: The “What”

What income is included:

- Gross wages and salary, overtime, commissions, tips, bonuses.
- Net income from the operation of a business
- Full and periodic amounts received from;
 - Social Security,
 - Annuities,
 - Insurance
 - Retirement funds
 - Pensions
 - Disability
- Payments in lieu of earnings (unemployment, disability, workers comp, severance)
- Welfare payments
- Alimony
- Child support

Question

Harry Harrelson is retired and his only income is from Social Security. When you see his reward letter, you see that it lists 3 different monthly amounts. It shows his gross award is \$1230.70 and he should receive \$1230 per month. However, it then goes on to explain that due to an overpayment, he will only receive \$900 for the next 12 months. Which is the correct amount to include on his annual income cert?

1. 1230×12
2. 900×12
3. $\$1230.70 \times 12$
4. None of the above

What is Excluded from “Income”?

- Income from employment of children under 18 YO
- Payments for care of foster children or adults
- Lump sum additions to family assets (inheritances, capital gains, settlements from losses)
- Reimbursement of medical costs
- Income from live-in aide
- Student financial aide
- Temporary, nonrecurring or sporadic income (including gifts)
- Earnings in excess of \$480 for each full time student 18 or older (excluding head of household or spouse)

Assets

What assets are included:

- Savings accounts
- Checking accounts
 - For checking accounts use average 6-month balance
- Cash in deposit boxes or at home
- Assets held in foreign countries
- Cash value of revocable trusts available to applicant
- Equity in rental prop or other capital investments
- Cash value of stocks, bonds, Treasury bills, CDs, mutual funds, money market accounts
- IRA's, 401K and Keough accounts (even though withdrawal would result in a penalty)
- Retirement and pension funds
- Cash value of life insurance policy available to individual before death (e.g. surrender value of whole life or universal life policy)
- Personal property held as an investments such as gems, jewelry, coin collections antique cars, etc.
- Mortgage or deeds of trust held by the applicant.

What is excluded from “assets”:

- Necessary personal property such as clothing, furniture, cars
- Interest in Indian trust lands
- Assets not effectively owed by the applicant. That is, when assets are held in an person's name, but the assets and any income they earn accrue to the benefit of someone else who is not a member of the household and that other person is responsible for income taxes incurred on income generated by the asset.
- Equity in cooperatives in which the family lives
- Assets not accessible to and that provide no income for the applicant.
- Term life insurance
- Assets that are part of an active business. “Business” does not include rental of properties that are held as an investment and not a main occupation.

Question

What would NOT be included when considering a family's *income*

1. A tenant's wages of \$8.00 per hour from the waitress job
2. The tips from that job
3. Child support payments she receives each month
4. The inheritance the tenant received from a recently deceased uncle

How is *income from assets* determined?

Assets are items of value that may be turned into cash.

1. A savings account is an asset. The bank pays interest on the asset. The interest is the *income* from that asset.
2. Some assets are not interest bearing. (\$ under the mattress!)

First we need to determine the cash VALUE of the household's assets.

Determining Cash Value

- Cash value= the market value *less* reasonable expenses incurred in selling or converting the asset to cash-
 - Penalties for premature withdrawal
 - Broker and legal fees; and
 - Settlement costs for real estate transactions

Example

- Household has a certificate of deposit (CD) in the amount of \$5,000 paying interest of 4%. The penalty for early withdrawal is three months interest.
 - $\$5,000 \times 0.04 = \200 in annual income
 - $\$200 / 12 \text{ months} = \16.67 interest per month
 - $16.67 \times 3 \text{ months} = \50.01 penalty IF withdrawn
 - $\$5,000 - \$50 = \$4950$ cash value of the CD
- *Please note- family need not convert the cd to cash- this is simply an exercise to determine true value of the asset to determine income from that asset.

Question

What is considered a reasonable expense for selling or converting an asset to cash?

1. Broker and legal fees
2. Settlement costs for real estate transactions
3. Penalties for premature withdrawal
4. All of the above

How to Treat Retirement Accounts

- While the person is employed include:
 - Only the amounts the family can withdraw without retiring or terminating employment.
 - Include the whole amount less penalties and transaction costs.
- At Retirement or termination include:
 - If the person receive the benefit as periodic payments, include the payment as part of the family income.
 - If the person receives the benefit as a lump sum, include the lump sum as part of the net family assets.

Asset Disposed Within Last 2 Years

Applicants who dispose of assets for less than fair market value (i.e., value on the open market in an “arms length transaction”) have, in essence, voluntarily reduced their ability to afford housing. Part 5, therefore requires it be counted as if they still owned the asset.

Asset Disposed Within Last 2 Years (cont.)

Mr. Jones cashed in stock to give granddaughter funds for college in August 2013. The stock had market value of \$4,500 and a broker fee of \$500 was charged for the transaction.

Market value	\$4,500
Less broker fee	<u>500</u>
Cash Value	\$4,000

The \$4,000 in assets would be counted for any annual income determination conducted until August, 2015 (looking forward for two years.)

Question

Mrs. O'Grady owns a home that is for sale. The taxable value of the property is \$150,000. She has it listed with a realtor for \$140,000. After completing her application, but prior to moving into your property, the home sells for \$135,000. Because the home sold for less than the taxable value, the \$15,000 difference is considered a disposed asset.

1. True
2. False

Now that we know the CASH
VALUE OF THE ASSET....

What do we do with that information?

Calculating Income from Assets:

- A. IF Total cash value of assets is less than \$5,000:
 - THEN Use the actual income the family receives from the assets is the amount that is included in annual income.
- B. IF Total cash value of assets is more than \$5,000:
 - 1. note the *Actual income* from the assets; and
 - 2. take the total cash value of the assets and “*impute*” income from assets (use .06%)
 - USE WHICHEVER IS HIGHER of 1. and 2. for the income from the assets

Question

A household's total cash value of assets is \$4,000, which is comprised of a checking account of \$1,500, and a savings account of \$2,500 that earns interest income of \$25 what amount of income from assets should be put on the income cert form?

1. \$25 (the actual amount of interest income from the savings account)
2. \$50 (the savings account balance x .06%)
3. \$80 (the balance of all assets x .06%)
4. None of the above

Maintaining Annual Income Files

Does your file “stand alone”?

Application for Housing

- An application that is comprehensive and captures as much information as possible.
 - Size of unit requested
 - Size of household (ages, student status)
 - Race/Ethnicity (“for purposes of federal reporting”)
 - Signed and dated by applicant
 - Household income from ALL sources
 - Any changes in income expected in next 12 months?
 - Assets of all kinds for all household members
 - Any lump sum?
 - Any dispossession of assets in last 2 years?
 - Remember to include all possible types of income/assets on application to avoid “surprises”
- **Same information should be collected at recertification.**

Income Documentation

- Wages/Public Assistance/Pension/Child Support, etc.
- Affidavits to prove lack of income, such as “no income”, “no child support”, etc.
 - Must include language such as “signed under pains and penalties of perjury”

Employment Income

- Employment income must be documented with TWO CONSECUTIVE MONTHS of paystubs.

Alimony or Child Support

- Copy of separation or divorce agreement indicating type of support, amount of payment, and schedule.
- Copy of most recent payment.
- Self declaration or signed affidavit signed by applicant indicating amount of support received.
- Amounts awarded by not received can only be excluded from annual income only when applicants have reasonable efforts to collect amounts due.

Regular Cash Contributions

-
- Be sure to include “cash gifts or other contributions” as a source on application and recertification form.

Example:

- Receiving cash gifts or contributions?
 - Yes **X** No
 - amount per month **\$ 125.00**
 - What for? *Helping with expenses*
 - How often *every month*
- To be entered as “other income” at
 - $\$125 \times 12 = \$1,500$

Self Employment

- All income sources must be verified including tips and gratuities.
- Documentation should include:
 - Signed self affidavit indicating amount earned and payment period
 - Form 1040 or 1040A

Self Employment and Business Owner

- Notarized statement showing new income of business
- Form 1040
- Audited or unaudited financial statements of the business including depreciation calculations
- Loan application listing income derived from the business from the proceeding 12 months.

Self Employment and Business Owner

www.irs.gov/pub/irs-pdf/f1040sc.pdf - Google Chrome

www.irs.gov/pub/irs-pdf/f1040sc.pdf

Apps Suggested Sites Amazon.com - ... HP - See What's... HP Games Imported From IE iCloud Calendar

SCHEDULE C
(Form 1040) **Profit or Loss From Business**
(Sole Proprietorship)

OMB No. 1545-0047
2013
Department of the Treasury
Internal Revenue Service
For information on Schedule C and its instructions, go to www.irs.gov/irschedulec.
Attach to Form 1040, 1040NR, or 1041; partnerships generally must file Form 1065.
Name of proprietor: _____ EIN: _____
Business address (including suite or room no.): _____
City, town or post office, state, and ZIP code: _____

Part I Income

1 Gross receipts or sales. See instructions for line 1 and check the box if this income was reported to you on Form W-2 and the "statutory employee" box on that form was checked: ☐ 1

2 Returns and allowances: ☐ 2

3 Subtract line 2 from line 1: ☐ 3

4 Cost of goods sold (from line 4): ☐ 4

5 Gross profit. Subtract line 4 from line 3: ☐ 5

6 Other income, including federal and state gasoline or fuel tax credit or refund (see instructions): ☐ 6

7 Gross income. Add lines 5 and 6: ☐ 7

Part II Expenses

8 Advertising: ☐ 8

9 Car and truck expense (see instructions): ☐ 9

10 Commissions and fees: ☐ 10

11 Contract labor (see instructions): ☐ 11

12 Depreciation: ☐ 12

13 Depreciation and section 179 expense deduction (see instructions): ☐ 13

14 Employee benefit programs (other than on line 15): ☐ 14

15 Insurance (other than health): ☐ 15

16 Interest: ☐ 16

17 Legal and professional services: ☐ 17

18 Office expense (see instructions): ☐ 18

19 Pension and profit-sharing plans: ☐ 19

20 Rent or lease (see instructions): ☐ 20

21 Repairs and maintenance: ☐ 21

22 Telephone: ☐ 22

23 Travel: ☐ 23

24 Utilities: ☐ 24

25 Wages (less employment credits): ☐ 25

26 Other expenses (from line 48): ☐ 26

27a Other expenses (from line 48): ☐ 27a

27b Reserved for future use: ☐ 27b

28 Total expenses before expenses for business use of home. Add lines 8 through 27a: ☐ 28

29 Tentative profit or (loss). Subtract line 28 from line 7: ☐ 29

30 Expenses for business use of your home. Do not report these expenses elsewhere. Attach Form 8829 unless using the simplified method (see instructions).
Simplified method filers only: enter the total square footage of: (a) your home: ☐ 30
(b) the part of your home used for business: ☐ 30

31 Net profit or (loss). Subtract line 30 from line 29.
If a profit, enter on both Form 1040, line 12 (or Form 1040NR, line 13) and on Schedule SE, line 2.
(If you checked the box on line 1, see instructions). Estates and trusts, enter on Form 1041, line 3.
If a loss, you must go to line 32.

32 If you have a loss, check the box that describes your investment in this activity (see instructions).
If you checked 32a, enter the loss on both Form 1040, line 12, (or Form 1040NR, line 13) and on Schedule SE, line 2. (If you checked the box on line 1, see the line 31 instructions). Estates and trusts, enter on Form 1041, line 3.
If you checked 32b, you must attach Form 6198. Your loss may be limited.

For Paperwork Reduction Act Notice, see the separate instructions.

Cat. No. 11334P Schedule C (Form 1040) 2013

Regarding Use of Tax Returns:

- If a copy of tax return is used, IRS Form 4506 “Request for Copy of Tax Return” must be completed and signed. (fee)
 - low income beneficiaries must not be required to pay for verifications as a condition of receiving assistance.
- Or- use IRS Form 4506T “Request for Transcript of Tax Return”

Verification/Documentation of Assets

Checking and Savings Accounts

- Things to remember about bank accounts:
 - Checking account value- average 6 months value
 - Savings account value- current balance



Annual Income Recertifications – How to prepare?

- Requirement to participate and cooperate in annual income recertification process must be a provision in your leases
- Recertification must be complete within 12 months of move-in or last recert.
 - “Complete”= all documentation collected and reviewed, tenant has signed off on cert.

Recertifications

- Annually, tenant income must be recertified (same process as initial certification)
 - Source documentation – 2 consecutive months- required
 - Review 3rd party verification
- Income documentation must be current (<6 months old).
 - Use effective date of recertification on recert form.

Recertifications (cont.)

- Alternative recertification method approved by DHCD-
 - If household benefits from a rental subsidy and income certified by the subsidy administrator (LHA)
 - **Then**, an affidavit of eligibility may be used for income certifications EXCEPT at Move-in and every 6th year of the Project
- **Full Income Documentation is required for all assisted households every sixth year of the project.**

Recertification of Annual Income by Government Programs

The purpose of this form is to certify that _____ (name of household) residing at _____ (address) receives benefits under _____ (name of government program). As such, the annual income of this household has been examined and determined to be below \$ _____ (income limit for the program for a family of ____ [household size]).

Certified by:

Signature of Authorized Representative _____

Name (Print) _____

Title _____

Agency _____

Date _____

WARNING:

Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly and willingly making false or fraudulent statements to any department of the United States Government.

Typical Schedule for Success:

- Tickler file with all tenants and recert date
- 90 days prior to recert date; send out a letter with requirements of income recertification. Include punch list of items the tenant must provide to you.
- 60 days prior to recert date; send out the punch list again and ask for them to return the items to you in one month.
- 30 days prior to recert date; hopefully all info has been provided. If not; send out 30 day notice to evict if information is not provided.

TENANT INCOME CERTIFICATION

☐ Initial Certification ☐ Recertification ☐ Other _____

Effective Date: _____
Move-In Date: _____
(MM-DD-YYYY)

PART I - DEVELOPMENT DATA

Property Name: _____ County: _____ TCAC# CA- _____ BIN #: _____
Address: _____ Unit Number: _____ # Bedrooms: _____ Square Footage: _____

PART II. HOUSEHOLD COMPOSITION

☐ Vacant (Check if unit was vacant on December 31 of the Effective Date Year)

HHI Mbr #	Last Name	First Name	Middle Initial	Relationship to Head of Household	Date of Birth (MM/DD/YYYY)	F/T Student (Y or N)	Last 4 digits of Social Security #
1				HEAD			
2							
3							
4							
5							
6							
7							

PART III. GROSS ANNUAL INCOME (USE ANNUAL AMOUNTS)

HHI Mbr #	(A) Employment or Wages	(B) Soc. Security/Pensions	(C) Public Assistance	(D) Other Income
TOTALS	\$	\$	\$	\$

Add totals from (A) through (D), above TOTAL INCOME (E): \$

PART IV. INCOME FROM ASSETS

HHI Mbr #	(F) Type of Asset	(G) C/I	(H) Cash Value of Asset	(I) Annual Income from Asset
TOTALS:	\$			\$
Enter Column (H) Total		Passbook Rate		
If over \$5000 \$ X 2.00%			(J) Imputed Income	\$
Enter the greater of the total of column I, or J: imputed income		TOTAL INCOME FROM ASSETS (K)		\$
(L) Total Annual Household Income from all Sources [Add (E) + (K)]				\$

HOUSEHOLD CERTIFICATION & SIGNATURES

The information on this form will be used to determine maximum income eligibility. I/we have provided for each person(s) set forth in Part II acceptable verification of current anticipated annual income. I/we agree to notify the landlord immediately upon any member of the household moving out of the unit or any new member moving in. I/we agree to notify the landlord immediately upon any member becoming a full time student.

Under penalties of perjury, I/we certify that the information presented in this Certification is true and accurate to the best of my/our knowledge and belief. The undersigned further understands that providing false representations herein constitutes an act of fraud. False, misleading or incomplete information may result in the termination of the lease agreement.

Signature _____	(Date) _____	Signature _____	(Date) _____
Signature _____	(Date) _____	Signature _____	(Date) _____

PART V. DETERMINATION OF INCOME ELIGIBILITY	
TOTAL ANNUAL HOUSEHOLD INCOME FROM ALL SOURCES: From item (L) on page 1 \$ 	RECERTIFICATION ONLY: Unit Meets Federal Income Restriction at: <input type="checkbox"/> 60% <input type="checkbox"/> 50% Unit Meets Deeper Targeting Income Restriction at: <input type="checkbox"/> Other _____%
Current Federal LIHTC Income Limit per Family Size: \$ _____	Current Federal LIHTC Income Limit x 140%: \$ _____ Household Income exceeds 140% at recertification: <input type="checkbox"/> Yes <input type="checkbox"/> No
Household Income as of Move-in: \$ _____	Household Size at Move-in: _____

PART VI. RENT	
Tenant Paid Monthly Rent: \$ _____ Monthly Utility Allowance: \$ _____ Other Monthly Non-optional charges: \$ _____	Federal Rent Assistance: \$ _____ *Source: _____ Non-Federal Rent Assistance: \$ _____ (*0-8) Total Monthly Rent Assistance: \$ _____
GROSS MONTHLY RENT FOR UNIT: (Tenant paid rent plus Utility Allowance and other non-optional charges) \$ 	*Source of Federal Assistance 1 **HUD Multi-Family Project Based Rental Assistance (PBRA) 2 Section 8 Moderate Rehabilitation 3 Public Housing Operating Subsidy 4 HOME Rental Assistance 5 HUD Housing Choice Voucher (HCV), tenant-based 6 HUD Project-Based Voucher (PBV) 7 USDA Section 521 Rental Assistance Program 8 Other Federal Rental Assistance 0 Missing
Maximum Federal LIHTC Rent Limit for this unit: \$ _____ Unit Meets Federal Rent Restriction at: <input type="checkbox"/> 60% <input type="checkbox"/> 50% Unit Meets Deeper Targeting Rent Restriction at: <input type="checkbox"/> Other: _____%	** (PBRA) Includes: Section 8 New Construction/Substantial Rehabilitation; Section 8 Loan Management; Section 8 Property Disposition; Section 202 Project Rental Assistance Contracts (PRAC)

PART VII. STUDENT STATUS	
ARE ALL OCCUPANTS FULL TIME STUDENTS? <input type="checkbox"/> yes <input type="checkbox"/> no	If yes, Enter student explanation* (also attach documentation) Enter 1-5
	*Student Explanation: 1 AFDC / TANF Assistance 2 Job Training Program 3 Single Parent/Dependent Child 4 Married/Joint Return 5 Former Foster Care

PART VIII. PROGRAM TYPE				
Mark the program(s) listed below (a. through e.) for which this household's unit will be counted toward the property's occupancy requirements. Under each program marked, indicate the household's income status as established by this certification/recertification.				
a. Tax Credit <input type="checkbox"/> See Part V above.	b. HOME <input type="checkbox"/> Income Status <input type="checkbox"/> ≤ 50% AMGI <input type="checkbox"/> ≤ 60% AMGI <input type="checkbox"/> ≤ 80% AMGI <input type="checkbox"/> OI**	c. Tax Exempt <input type="checkbox"/> Income Status <input type="checkbox"/> 50% AMGI <input type="checkbox"/> 60% AMGI <input type="checkbox"/> 80% AMGI <input type="checkbox"/> OI**	d. AHDP <input type="checkbox"/> Income Status <input type="checkbox"/> 50% AMGI <input type="checkbox"/> 80% AMGI <input type="checkbox"/> OI**	e. (Name of Program) <input type="checkbox"/> Income Status <input type="checkbox"/> <input type="checkbox"/> OI**
**Upon recertification, household was determined over-income (OI) according to eligibility requirements of the program(s) marked above.				

SIGNATURE OF OWNER/REPRESENTATIVE	
Based on the representations herein and upon the proof and documentation required to be submitted, the individual(s) named in Part II of this Tenant Income Certification is/are eligible under the provisions of Section 42 of the Internal Revenue Code, as amended, and the Land Use Restriction Agreement (if applicable), to live in a unit in this Project.	
SIGNATURE OF OWNER/REPRESENTATIVE _____	DATE _____

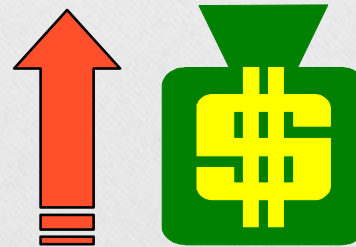
Changes in Tenant's Income at Recertification

Increases in Tenant Income HOME

- If the income of a tenant in Low HOME (VLI) unit increases up to 80% of AMI:
 - Must rent the next HOME-assisted unit (fixed projects) or next available unit (floating projects) at Low HOME rent.
 - If the project's units float, you may allocate the Low HOME status to a VLI-eligible household, if there is one available

Increases in Tenant Income HOME (cont.)

- If at recertification, the income of a tenant in a HOME unit exceeds 80% of AMI...



Increases in Tenant Income HOME (cont.)

- Tenant may remain in assisted unit BUT
- (FIXED units): Tenant must pay rent equal to 30% of adjusted monthly income.
- (for FLOATING units): Tenant must pay rent equal to 30% of adjusted monthly income up to the 'street' or market rent level and "next available" unit rule applies.
- Units with HOME and LIHTC:
 - Rents must be raised and capped at the LIHTC Rent Limit
- (In all cases of combined funding sources; the most restrictive rent rules apply.)

Increases in Tenant Income

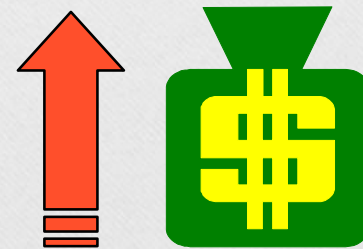
DHCD Bond Fund Programs

- If the income of a tenant in a HSF, CIPF, HIF, CBH, AHTF, CATNHP/TOD (VLI 50%) or (ELI 30%) unit increases up to 80% of AMI:
 - Must rent the next DHCD-assisted unit at VLI or ELI rent. You may allocate the VLI or ELI status to a VLI or ELI-eligible household, if there is one available

Increases in Tenant Income

DHCD Bond Fund Programs (cont.)

- If at recertification, the income of a tenant in a HSF, CIPF, HIF, CBH, AHTF, CATNHP/TOD unit exceeds 80% of AMI (or 100% of AMI for projects with AHRs that permit this increase in AMI for HSF units after the 1st 20 years)...



Increases in Tenant Income

DHCD Bond Fund Programs (cont.)

- Tenant may remain in assisted unit BUT
 - The family will no longer be considered income qualified, and
 - The rent must be raised to 1/12 of 30% of the Family's Household Income as recertified annually or the comparable market rent for the unit
 - The “next available” unit rule applies.
- Units also assisted LIHTC:
 - Rents must be raised and capped at the LIHTC Rent Limit
- (In all cases of combined funding sources; the most restrictive rent rules apply.)

ONGOING OCCUPANCY-RELATED ISSUES

Property Standards

- Housing Quality Standards HQS
 - Along with state and local code, HQS has been the standard for HOME, HSF, CIPF, HIF, CBH, AHTE, CATNHP/TOD. All units and sites are required to be maintained in decent, safe, secure and sanitary manner.
 - Management is required to inspect all units, at least annually.
 - Completed inspection reports should be maintained in the resident and or property file to document compliance with this standard.
- Originally, on January 24, 2015- state and local code with UPCS was to become the new standard for HOME (and HSF, CIPF, HIF, CBH, AHTE, CATNHP/TOD).
 - *We expect HUD to issue further guidance on the specific inspectable elements of UPCS that will apply to HOME. The other programs will follow.

Lead-Based Paint

- All properties assisted with HOME must comply with the HUD federal regulations at 24 CFR Part 35 and the Massachusetts Lead Law whether or not children under six will reside at the property
- All properties assisted with HSF, CIPF, HIF, CBH, AHTE, CATNHP/TOD must comply with the MA Lead Law whether or not children under six will reside at the property.
- After completion of rehabilitation the owner must receive a Letter of Full Compliance.
- On going maintenance must continue to comply, including the implementation of Lead Safe Work Practices.
- Management must provide all new move-ins a Lead Paint Disclosure pamphlet. Evidence documenting receipt should be maintained in the tenant file.

Accessibility Requirements

- Requirements do not end with initial rent-up.
- Management should have an accessibility plan in place.
 - The plan must DYNAMIC, changing as often as your site changes.
- All programs must be accessible (It's not only about the units!)
- Don't forget, common areas need to be accessible too!

Accessibility Requirements (cont.)

- What happens when someone makes a reasonable accommodations request?
- **Where** are your Sensory and Mobility units?
 - Do the current tenants require the adaptations?
 - Do they have an agreement to be moved to a different apartment if there is an applicant who requires the adaptations?
- Site Staff **MUST** have knowledge of accessible unit locations and features

Federal Accessibility Requirements

Section 504

- Projects assisted with HOME funds must comply with Section 504
- The Basics:
- Multi-Family New Construction
 - 5% of units (not <1); Accessible to individuals with mobility disabilities.
 - **Additional** 2% of units (not <1) accessible to individuals with sensory disabilities.
- Multi-Family Substantial Rehabilitation
 - Requirements trigger at 15 units and/or if cost of rehab is 75% or more of replacement cost.
 - It's desirable to create accessibility even if Federal or State requirements don't trigger physical accessibility.

State Accessibility Requirements

MAAB 521 CMR

- Projects assisted with HOME, HSF, CIPF, HIF, CBH, AHTF, CATNHP/TOD must comply with MAAB 521 CMR
- New Construction and Renovations of 20+ unit:
 - 5% of units; Accessible to individuals with mobility disabilities.
 - **Additional** 2% of units accessible to individuals with sensory disabilities.
- CBH accessibility requirements may exceed MAAB 521 CMR. Guidelines can be found at www.cedac.org.

Affirmative Fair Housing Marketing Plan (AFHMP)

- Before any project marketing begins:
- Management with the owner must develop an AFHMP and Tenant Selection Plan:
 - For more information go to:
www.mass.gov/hed/docs/dhcd/hd/fair/afhmp.pdf
- Analyze the market and assess which groups are least likely to apply.
- Develop strategies to reach those least likely to apply.
- Remember- this is also a LIVING document/plan.
 - **Review and modify over time. DHCD should approve any changes.**

AFHMP (cont.)

- Use HUD Logos (EHO, etc.) in all advertising & rental materials.
- Advertise locally, as well as other parts of the state and use essential marketing materials in other languages.
- Ensure that written marketing materials encourage a wide range of applicants.
 - Language such as “Active Adult Community” NOT ALLOWED in advertising (could discourage applicants with mobility impairments).

AFHMP (cont.)

- Advertise on MassAccess for all DHCD-assisted units, including accessible units
 - www.Massaccesshousingregistry.org
- Metro Boston- Use Metro List for all unit and waitlist marketing. (Phone# 617-635-3321)
 - <http://www.cityofboston.gov/fairhousing/fairhousing/metrolist.asp>
- TTY/TDD Communication Services-Text Telephones (TTY), also known as Telecommunications Device for the Deaf (TDD), are used by the deaf, hard-of-hearing, and individuals with speech impairments to communicate.
- Maintain a written waitlist.

AFHMP (cont.)

- Lottery **REQUIRED** for initial rent-up
- Lottery process **Must** be described in your Tenant Selection Plan
 - When, where, and how it will be conducted
 - Must outline eligibility requirements
 - Use qualified Lottery Administrator to conduct the lottery

AFHMP (cont.)

- If community wants to implement local preference:
 - Demonstrate need for the local preference in AFHM plan
 - Demonstrate no disparate impact on protected classes
 - May not exceed more than 70% of affordable units
 - Local residency preferences must not be advertised
- Must meet DHCD's lottery guidelines and be pre-approved by DHCD!

Supportive Service Plans

- HIF projects should have a written supportive service plan and a service budget in place.
 - Service provider name
 - List of services to be provided
 - Description of the tenant's access to services
 - Schedule of service provision to the tenant or entirety of the service population
 - Staffing model
 - Budget describing the costs of service provision and the intended funding source
- Tenants living in CBH units typically receive services from independent providers.

Limited English Proficiency (LEP)

- All DHCD-assisted properties must comply with Executive Order 13166
- Requires that management have policies and procedures in place to assist persons with Limited English Proficiency participate in and benefit from the DHCD-assisted housing units.
- Management must develop a Language Access Plan (LAP)
 - Methods for Oral Communication
 - Methods for Written Translation
 - Documents to be Translated
- Resources:
 - www.lep.gov/ISpeakCards2004.pdf
 - https://www.masshousingrental.com/portal/server.pt/community/library/332/limited_english_proficiency

Methods of Oral Communication

- Share language services between sites
- Train bilingual staff to act as interpreters
- Telephone and video conferencing interpreter services
- Language line account thru AT&T: www.language.com
- Tapes and audio files
- Community volunteers (make formal agreements)

Methods for Written Translation

- Standardize documents to reduce translation needs
- Translate an entire document
- Translate a short description of the document
- Provide a statement in various languages that says “If you don’t understand this document we will provide you oral translation at no cost to you”
- Consider using a professional translator to proof/ensure accurate translation if bi-lingual staff is used to translate documents

Documents to be Translated

- Vital documents are those that are critical for ensuring meaningful access by applicants, households served, and LEP persons specifically.
 - Notices of free language assistance
 - Housing applications
 - Income certification forms
 - Written notices of rights, denial, loss or decreases in benefits or services (including recertification notices for rentals)
 - 30-day notices
 - Outreach/marketing materials

Conflict of Interest Policy

- All DHCD- assisted properties must have a written Conflict of Interest Policy.
- Comply with HOME Rule at 24 CFR Part 92.356
 - No owner, developer or sponsor of a project assisted with DHCD funds may occupy a DHCD-assisted affordable housing unit.
 - includes; officer, employee, agent, elected official, appointed officer, consultant of/to the owner or developer and immediate family members of these persons.
- Some Exceptions: DHCD will review exceptions requests on a case by case basis and determine if consultation with HUD is required (HUD only for HOME)
- Exceptions may be granted if the “conflicted person” is otherwise eligible and wants to apply for housing.
 - Must be treated same as all applicants
 - Must be granted waiver prior to move in

Lease Terms All Programs

- Leases must be for at least 1 year, unless agreed upon by owner and tenant (DHCD requires 1 year lease unless a waiver is approved)
- Owner may terminate tenancy with 30 days notice under certain conditions but may not terminate with less than 30 days notice (except AHTF)

Allowable Reasons for Terminations

- Serious or repeated violation of the terms and condition of the lease,
- Violation of Federal, State or local law,
- Completion of the tenancy period for transitional housing,
- A tenant's failure to participate in any required supportive services of transitional housing
- An increase in a tenant's income does **NOT** constitute good cause for termination.

On-going Reporting

- The Federal and State governments continue to be interested in on-going data on subsidy beneficiaries
 - Agencies' abilities to report play a crucial role in the allocation of funding
- Web-Based Annual Occupancy Reporting to DHCD
 - Beneficiary data

HIF and CBH On-going Reporting

- Annually project owners must submit to CEDAC:
 - HIF and CBH project cash flow template
- Bi-annually project owners must submit to CEDAC:
 - HIF and CBH Compliance Affidavit
 - www.cedac.org/Forms/ApplicationForms.html

DHCD Monitoring and Inspections

- We all want the same results- Substantial Compliance!
- Please note- The HOME Program has had significant reductions in funding in recent years, in part, because of non- compliance. It is best for everyone if we can operate all housing programs correctly so we don't have to face reductions in funding, or increases in rules as we go forward.
- DHCD is also monitored by HUD and State Auditors and understands that monitoring can be difficult.

DHCD Monitoring and Inspections

- We must verify compliance with program requirements each year
- On-site property inspections are required based on DHCD risk assessment.
- Projects found to have health/safety issue: DHCD will adopt a more frequent inspection schedule for problem properties
- Owner (PM on owner's behalf) will need to certify annually that units are suitable for occupancy

DHCD Monitoring and Inspections

- Site visits when inspections are required
- Desk audits for projects in compliance in lieu of visit for years when inspections are not required

Scheduling the Visit

- Monitoring agent will contact you at least two weeks in advance of visit
- An “open book” test; we want you to pass
 - You’ll get a copy of the monitoring guides.
 - You’ll have time to check your files.
 - You are welcome to call with questions.
- Financial information should be provided electronically prior to site visit.
- Notify all DHCD-assisted households regarding potential inspection

Monitoring Visit

- Visit typically completed in 1/2 day to 1 day/site
 - 1. Interview and documentation review for financial and insurance issues, fair housing, etc.
 - 2. Unit file review (random sample of 20% of DHCD-assisted unit files or at least 3 files)
 - 3. On-site inspections (random sample of 20% of DHCD-assisted units or at least 3 units and at least 1 unit per building. Common areas and building systems are also inspected.)

More Details Required for Monitoring:

- Current rent roll identifying DHCD-assisted units and the income designations
- Unit numbers of accessible units; sensory and mobility
- Unit numbers of Project Based Assisted units (PBA's)
- PM's annual unit inspections should be documented in unit files
- Tenants files with current recertifications
- Complete Affordability Matrix –by unit/by income level/fund – to measure compliance with requirements described in loan documents.

More Details Required for Monitoring (cont).

- Review of financial condition of rental projects.
 - Annual project financial audits –in electronic form
 - DHCD and CEDAC as loss payee on property insurance
 - Comparative income statement- how are things going now?
 - Annual Cash Flow report covering last two full years
 - Replacement Reserve Account balance?
 - Contributions?
 - Operating Reserve Account balance
 - Disbursements from reserves over the last 12 months
 - How are you thoughtfully managing this housing asset?

Compliance Report

- FinePoint writes a draft report on compliance. We make very effort to help you reach substantial compliance before we submit our report to DHCD.
- The final report is sent to the owner and manager by DHCD under DHCD letterhead.

Recommendations & Findings

- Monitoring letter issued by DHCD:
 - Recommendations:
 - Address good practices for improved compliance
 - No response required, but expect to see improvement next visit
 - Findings:
 - Addresses statutory/regulatory violations
 - Must cure/respond in 45 days
- Please note: completing corrective action is more important now than ever! HUD and State monitors have spent significant time reviewing this at DHCD.

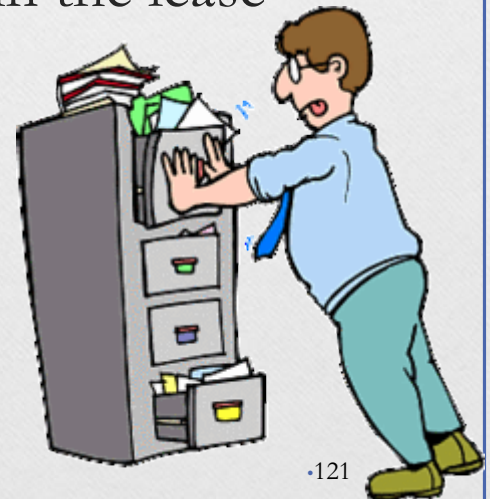


Common Compliance Issues

- Inability to identify the exact sensory accessible and mobility accessible units at the site.
- Lack of documentation of all income and assets
- Income eligibility not verified with source documentation for rental assisted units at initial occupancy and every 6th year *of the project*
- Files lacking certification of income eligibility from a PHA or Regional Administrator for rental assisted units

Common Compliance Issues (cont.)

- Incomplete financial records
- No conflict of interest policy in place
- 14 day vs. 30 day notice of termination in the lease
- Disorganized tenant files



Web Resources:

- HUD's "Home Page" for HOME:
- <https://www.hudexchange.info/programs/home/>
- DHCD's website:
<http://www.mass.gov/hed/economic/eohed/dhcd>
- DHCD e-SOURCE To subscribe send a blank email to:
join-dhcd-housingdevelopment@listserv.state.ma.us

FinePoint Associates, LLC

- Elaine Nickerson
 - 617.543.2204 Elaine@FinePointAssociates.com
- Lindsay Cohrs
 - 508.340.8890 lindsaycohrrs@gmail.com
- Olga Pitel
 - 508.341-5542 opitel22@gmail.com
- Kimberly O'Brien
 - 978.394.8707 kimberly@FinePointAssociates.com
- Laurie Tickle
 - 617-548-7640 laurietickle@yahoo.com
- Kate Joyce
 - 508.574.8293 Kate@FinePointAssociates.com

DHCD Contact Information

- Alana Murphy
 - Deputy Associate Director
 - Division of Housing Development
 - 617.573.1301
 - Alana.Murphy@state.ma.us
- Rebecca Frawley Wachtel
 - HOME Program Director
 - 617.573.1318
 - Rebecca.Frawley@state.ma.us

DHCD Contact Information (cont.)

- Rachel Carlson
 - HSF/CIPF/CATNHP Program Director
 - 617.573.1303
 - Rachel.Carlson@state.ma.us
- Ayana Gonzales
 - HIF Program Director
 - 617.573.1100
 - Ayana.Gonzales@state.ma.us

CEDAC and MassHousing

- Debbie Schnitzer: CFO, CEDAC
 - HIF Program and CBH
 - Dschnitzer@CEDAC.org
 - 617.727.5944 ext 114
- Lynn Shields: MassHousing
 - AHTF
 - LShields@masshousing.com
 - 617.854.1381